

**THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

THIRD SET OF INFORMATION REQUESTS OF
ALLEGIANCE TELECOM OF MASSACHUSETTS, INC. TO
VERIZON MASSACHUSETTS

D.T.E. 02-8

Pursuant to 220 C.M.R. 1.06(b)(c), Allegiance Telecom of Massachusetts, Inc. ("Allegiance") submits to Verizon Massachusetts ("Verizon" or "Verizon MA") the following information requests.

INSTRUCTIONS

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to Verizon or to any individual or entity sponsoring testimony or retained by Verizon to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as may be available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.
6. Each Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the

addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.

7. For each document produced or identified in a response that is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recordation system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If Verizon cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why Verizon cannot answer the Request in full, and state what information or knowledge is in Verizon's possession concerning the unanswered portions.
10. If, in answering any of these Requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response which does not provide Allegiance with the responsive documents, and or which directs Allegiance to inspect documents at any location is not responsive.
13. If you refuse to respond to any Request by reason of a claim of privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the

response provided.

15. Provide two copies of each response.
16. Unless the Request specifically provides otherwise, the term "Verizon" refers to Verizon MA's intrastate operations and includes all witnesses, representatives, employees, and legal counsel.
17. Please provide all responses to requests within 10 business days from receipt of request, as established by the Hearing Officer's Ground Rules dated February 27, 2002.

INFORMATION REQUESTS

AL-VZ-3-1: On Page 2 of Verizon’s Panel Surrebuttal Testimony, the witnesses state: “Once access of any sort is given – even authorized access – there is greater “foot traffic” in the central offices which potentially exposes the network infrastructure to a greater degree of risk.” Please indicate what other measures, if any, Verizon has taken to reduce or eliminate “foot traffic” in its central offices by vendors, contractors, guests, cleaning crews, etc. Please provide documentation of any such measures.

AL-VZ-3-2: Referring to Page 10 of Verizon’s Panel Surrebuttal Testimony, with respect to Verizon’s proposal to convert one in-service arrangement at its Hopkinton central office to a virtual collocation arrangement, please indicate if there have been any security-related incidents or breaches at this particular central office. If so, please provide details of such incidents or breaches. In addition, other than Verizon’s stated reason for converting this one in-service arrangement in Hopkinton, *i.e.*, the lack of separate space at this central office is inconsistent with Verizon’s proposal to restrict all collocated equipment to separate space, is there anything specific about the layout and configuration of the Hopkinton central office which renders the Hopkinton central office unsuitable for continued use of shared space? If so, please explain.

AL-VZ-3-3: On Page 11 of Verizon’s Panel Surrebuttal Testimony, with respect to the FCC’s requirement that states allow cageless collocation, the witnesses state that “the FCC’s requirements predated the events of September 11th. The Department is legitimately examining the risks associated with those requirements post-September 11.” Is it Verizon’s position that the events of September 11 relieved either Verizon or the Department of its obligation to conform to FCC regulations with respect to collocation?

AL-VZ-3-4: On Page 15 of Verizon’s Panel Surrebuttal Testimony, with respect to the factors proposed by Verizon for determining which central offices should be deemed “critical” central offices, the witnesses state: “...these factors include whether accidental or intentional damage to the network resulting in disruption of existing service in particular central offices could pose national security risks, endanger the health, safety and welfare of many more lives, and jeopardize the operations of major businesses, public safety, and government agencies, as well as advanced technology companies and other institutions that are involved in national security matters.”

With respect to the references to “operations of major businesses” and “advanced technology companies”, please clarify if the factors presented by the witnesses are limited to businesses and companies “involved in national security matters.” Specifically, based on the factors set out above, if a major business *not involved in security matters* is served by a central office, would the presence of that business be a contributing and/or determining factor in deciding whether that central office is “critical” under Verizon’s proposal?

AL-VZ-3-5: Referring to Page 16 of Verizon’s Panel Surrebuttal Testimony, with respect to the four E911 control tandems in Massachusetts central offices, (a) please identify the location of the four central

offices in which the E911 control tandems are located; and (b) notwithstanding your response to (a), please describe where these E911 control tandems are located relative to CLEC equipment, *i.e.*, are they located in secure separate space, would CLEC personnel need key or card access in order to come in contact with these tandems?

AL-VZ-3-6: Referring to Page 17 of Verizon's Panel Surrebuttal Testimony, please explain what Verizon means by "economic interest of the general public" and how that factor would be applied and considered for purposes of determining which central offices qualify as "critical" under Verizon's proposal in this docket?

AL-VZ-3-7: Referring to Pages 26-28 of Verizon's Panel Surrebuttal Testimony, and specifically to Verizon's witnesses' response to AT&T's contention that Verizon's proposals in this investigation are unlawful, does the June 18, 2002 decision of the United States Circuit Court of Appeals for the District of Columbia Circuit in Verizon et al. v. FCC, in which the court dismissed Verizon's appeal of the FCC's colocation rules, have any impact on the witnesses' opinion? If so, what is that impact? If not, why not?

AL-VZ-3-8: Referring to page 27 of Verizon's Panel Surrebuttal Testimony, the Verizon witnesses state "Given that the Department has already ruled that physical collocation arrangements generally should be in separated, secured space, Verizon MA's proposals are appropriate." In making that statement, is the panel referring to any Department ruling other than the Department's 1998 order in D.T.E. 98-21?